

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEVIN UPCHURCH	)	
Plaintiff,	)	No. 08 CV 2246
	)	Judge Guzman
v.	)	Magistrate Judge Valdez
	)	
P.O. KWIATKOWSKI Star No. 201,	)	
SGT. P. RICHIE Star No. 47,	)	
P.O. C. ERICKSON Star No. 199,	)	
P.O. ZIEMINSKI Star No. 190, individually,	)	
and CALUMET CITY,	)	
Defendants.	)	JURY DEMANDED

**MOTION FOR EXTENSION OF TIME TO FILE INDIVIDUAL OFFICERS  
ANSWER TO COMPLAINT**

Now come the Defendants, P.O. KWIATKOWSKI, SGT. P. RICHIE, P.O. C. ERICKSON, and P.O. ZIEMINSKI, by and through their attorneys, JAMES J. ROCHE & ASSOCIATES, and ask this Honorable Court for an extension of time to file our Answer to Plaintiff's Complaint and in support thereof, state as follows:

1. Defense counsel James J. Roche & Associates was recently assigned for the individual officers in this case.
2. Immediately upon notification, defense counsel at James J. Roche & Associates filed their appearance on behalf of the individual officers on June 16, 2008.
3. Defense counsel James J. Roche & Associates anticipates it will have the requisite information to file their Answer on or about June 24, 2008.
4. Defendants are confident they have meritorious answers and defenses in this case before this Honorable Court.
5. This motion is not a dilatory motion and granting Defendants this motion will not unduly prejudice Plaintiff.

WHEREFORE, the Defendants pray this Honorable Court grant us leave to file its answer or other responsive pleading within fourteen (14) days of this motion being heard.

Respectfully submitted,

/S/ Kelly Maloney Kachmarik

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